

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF COBRA ACQUISITIONS LLC REGARDING ITS
REQUEST TO BE HEARD AT THE JUNE 29-30, 2022 OMNIBUS HEARING**

Cobra Acquisitions LLC (“Cobra”), by and through its undersigned counsel, submits this informative motion in response to the *Order Regarding Procedures for June 29-30, 2022, Omnibus Hearing* (Docket No. 21264, Case No. 17-3283) (the “Order”), and respectfully states as follows:

1. Abid Qureshi of Akin Gump Strauss Hauer & Feld LLP will appear via Zoom on behalf of Cobra at the omnibus hearing on June 29, 2022 and seek to be heard on *Cobra Acquisitions LLC’s Motion to Lift Stay Order* (Docket No. 21145, Case No. 17-3283).

2. Cobra reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Cobra.

[Signature page follows]

DATED: June 27, 2022

Respectfully submitted,

REICHARD & ESCALERA, LLC

/s/ Rafael Escalera Rodríguez
Rafael Escalera Rodríguez
USDC-PR No. 122609
escalera@reichardescalera.com

/s/ Sylvia M. Arizmendi
Sylvia M. Arizmendi
USDC-PR No. 210714
arizmendis@reichardescalera.com

/s/ Carlos R. Rivera Ortiz
Carlos R. Rivera Ortiz
USDC-PR No. 303409
feliciano@reichardescalera.com

/s/ Jose R. Feliciano Boada
Jose R. Feliciano Boada
USDC-PR No. 307908
feliciano@reichardescalera.com

255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, PR 00917-1913
Telephone: (787) 777-8888

AKIN GUMP STRAUSS HAUER & FELD
LLP

Thomas P. McLish (*pro hac vice*)
tmclish@akingump.com

Scott M. Heimberg (*pro hac vice*)
sheimberg@akingump.com

Allison S. Thornton (*pro hac vice*)
athornton@akingump.com

2001 K Street, N.W.
Washington, DC 20006
Tel: (202) 887-4000
Fax: (202) 887-4288

and

Ira S. Dizengoff (*pro hac vice*)
Philip C. Dublin (*pro hac vice*)
Abid Qureshi (*pro hac vice* pending)
idizengoff@akingump.com
pdublin@akingump.com
aqureshi@akingump.com

Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, New York 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002

CERTIFICATE OF SERVICE

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera Ortiz
USDC-PR 303409

Exhibit A

Party Appearance Cover Sheet

Name of Party	Cobra Acquisitions LLC
Party Name Abbreviation	Cobra
Attorney(s) Representing Party	Name: Abid Qureshi Email: aqureshi@akingump.com Firm: Akin Gump Strauss Hauer & Feld LLP Phone Number: 212-872-8027 Zoom Screen Name: Abid Qureshi